

LAGOMARSINO LAW
3005 West Horizon Ridge Parkway, #241, Henderson, Nevada 89052
Telephone (702) 383-2864 Facsimile (702) 383-0065

LAGOMARSINO LAW
ANDRE M. LAGOMARSINO, ESQ. (#6711)
CORY M. FORD, ESQ. (#15042)
3005 West Horizon Ridge Parkway, #241
Henderson, Nevada 89052
Telephone: (702) 383-2864
Facsimile: (702) 383-0065
aml@lagomarsinolaw.com
Attorneys for Plaintiff Parnell Jay Fair

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

PARNELL JAY FAIR, individually,

Plaintiff,

v.

LAS VEGAS METROPOLITAN POLICE
DEPARTMENT, a political subdivision of the
State of Nevada; LUKAS TURLEY,
individually; ALEXANDER RYNDAK,
individually; DOES I – X, and ROES I – X,
inclusive

Defendants.

CASE NO: 2:20-cv-01841-JCM-BNW

**STIPULATION AND [PROPOSED]
ORDER FOR ADDITIONAL TIME FOR
PLAINTIFF TO REPLY TO
DEFENDANT’S PARTIAL OPPOSITION
TO PLAINTIFF’S RENEWED MOTION
FOR LEAVE TO AMEND COMPLAINT
(ECF NO. 101)**

(First Request)

IT IS HEREBY STIPULATED AND AGREED between the parties that Plaintiff Parnell Jay Fair shall have up to and including March 22, 2022, to file a reply to Defendant’s Partial Opposition to Plaintiff’s Renewed Motion for Leave to Amend Complaint.

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1 This is Plaintiff's first request for an extension and is made in good faith to allow Plaintiff to
 2 prepare a proper reply. Good cause exists because Plaintiff's counsel conducted an all-day
 3 deposition during the reply period and, additionally, is out of the jurisdiction for 3 days during the
 4 reply period. As a result, he has been unable to devote adequate time to drafting a reply brief.

5
 6 DATED this 14th day of March 2022

7 /s/ Andre M. Lagomarsino

8 **LAGOMARSINO LAW**

9 Andre M. Lagomarsino, Esq. (#6711)
 10 Cory M. Ford, Esq. (#15042)
 11 3005 W. Horizon Ridge Pkwy., #241
 Henderson, Nevada 89052
 Telephone: (702) 383-2864
Attorneys for Plaintiff Parnell Fair

DATED this 14th day of March 2022

/s/ Ryan W. Daniels

KAEMPFER CROWELL

Lyssa S. Anderson, Esq. (#5781)
 Ryan W. Daniels, Esq. (#13094)
 Kristopher J. Kalkowski, Esq. (#14892)
 1980 Festival Plaza Drive, Suite 650
 Las Vegas, NV 89135
*Attorneys for Defendants LVMPD, Lukas
 Turley, and Alexander Ryndak*

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 13 **IT IS SO ORDERED.**

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15 UNITED STATES MAGISTRATE JUDGE

16 DATED: March 15, 2022

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